

## CHECKLIST ENVIRONMENTAL ASSESSMENT

<b>Project Name:</b>	Saint Regis Sewer Force Main Line Replacement
<b>Proposed Implementation Date:</b>	Fall 2023
<b>Proponent:</b>	Saint Regis Sewer District/WGM Group
<b>Location:</b>	Clark Fork River Crossing within the SW4, of Section 19, T18N-R27W
<b>County:</b>	Mineral

### I. TYPE AND PURPOSE OF ACTION

Saint Regis Sewer District (SRSD) has submitted an easement application. The proposed easement would be 30' wide X 394.48' long. A 7" diameter pipe would be directionally drilled approximately 30 feet below the riverbed in the Clark Fork River. Additional pipe would be installed via trenching on the east and west banks of the river to connect the system (outside of DNRC jurisdiction). The proposal would replace a sewer force main that rests on the riverbed within the Clark Fork River.

Montana Code (MCA 70-16-201) provides for state ownership from the low water mark to the low water mark on navigable water bodies. Based on historical evidence, the Clark Fork River is commercially navigable from Deer Lodge, Montana to the Idaho state line. Therefore, the state claims ownership of the riverbed below the low water mark between these two points.

### II. PROJECT DEVELOPMENT

#### 1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

*Provide a brief chronology of the scoping and ongoing involvement for this project. List number of individuals contacted, number of responses received, and newspapers in which notices were placed and for how long. Briefly summarize issues received from the public.*

Affected landowners along the proposed route of the sewer force main have been contacted by WGM on behalf of the Saint Regis Sewer District. DNRC claims ownership of the land below the low water mark at the Clark Fork River crossing.

#### 2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

*Examples: cost-share agreement with U.S. Forest Service, 124 Permit, 3A Authorization, Air Quality Major Open Burning Permit.*

SPA 124 Permit: MT FWP Approved-The Mineral County Conservation District and Montana Fish, Wildlife and Parks determined an SPA 124 permit is necessary for the proposed project. FWP approved the proposed project and provided permit number SPA-07-23 R-2 (approved March 15, 2023)

Flood Plain Permit: Mineral County Floodplain-Pending-The review fee has been paid to the Mineral County Floodplain Administrator and the application has been submitted for review. It is currently pending approval.

#### 3. ALTERNATIVE DEVELOPMENT:

*Describe alternatives considered and, if applicable, provide brief description of how the alternatives were developed. List alternatives that were considered but eliminated from further analysis and why.*

**The No Action Alternative** – DNRC would not grant an easement for relocating the sewer main line below the riverbed. SRSD would continue using the damaged main line with the threat of additional sewage leaking into the Clark Fork River.

**The Action Alternative** – the DNRC would grant SRSD’s request for an easement to replace the existing sewer main line with a new line below the riverbed. The new main sewer line would be directionally drilled below the riverbed.

### III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter “NONE” if no impacts are identified or the resource is not present.*

#### 4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

*Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify direct, indirect, and cumulative effects to soils.*

**No Action:** No effects

**Proposed Action:** Directional drilling would occur below and across the Clark Fork River at a depth of 30 feet below the lowest elevation of the bed of the Clark Fork River. No unusual geologic features are known in the area or are expected to be encountered by the proposed action.

Although no impacts to soil within the low water mark are anticipated, soil mitigations for areas outside of the DNRC jurisdiction would be addressed in the 124 permit with Montana Fish, Wildlife and Parks. Additional mitigations may also be outlined in the Mineral County Floodplain permit if it were to be issued for this proposal.

Impacts to the unusual geologic features, soil quality, stability, and moisture within the DNRC Navigable Water jurisdiction are not anticipated with this project.

#### 5. WATER QUALITY, QUANTITY AND DISTRIBUTION:

*Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify direct, indirect, and cumulative effects to water resources.*

**No Action:** The existing sewer force main line is currently damaged. A temporary repair took place, but if the existing structure were to remain, a more robust repair would need to occur. This could cause more impacts to water quality than the proposal (which would utilize directional drilling and cause minimal impacts to water quality). If the temporary repair fails raw sewage would leak into the Clark Fork River.

**Proposed Action:** Surface water would not be encountered by the proposed action. Directional bore would pass through groundwater when it crosses under the riverbed. The proposal would require the contractors to use a water based mud with bentonite clay as this will be non-toxic and consist of natural materials. Contractors would be prohibited from using any environmentally non-compatible polymers or oils as additives to the mud. The drillers would be required to dispose of spent drilling mud and other spoils at a designated disposal site to prevent any releases of these materials to the river (this would be outside of DNRC jurisdiction).

Due to the fact that the sewer force main line would be relocated below the riverbed rather than resting on it, the proposed action would have positive minor to moderate impact over the existing condition.

#### 6. AIR QUALITY:

*What pollutants or particulate would be produced (i.e. particulate matter from road use or harvesting, slash pile burning, prescribed burning, etc)? Identify the Airshed and Impact Zone (if any) according to the Montana/Idaho Airshed Group. Identify direct, indirect, and cumulative effects to air quality.*

**No Action:** No effects

**Proposed Action:** The project would be short in duration. Some temporary emission releases would be expected during construction activities; however, air quality would not be impacted to any measurable degree.

---

**7. VEGETATION COVER, QUANTITY AND QUALITY:**

*What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify direct, indirect, and cumulative effects to vegetation.*

**No Action:** No effects

**Proposed Action:** The State jurisdiction lies below the low water mark of the Clark Fork river and does not support terrestrial vegetation. The proposal calls for boring under the riverbed, thus there would be no impact to either terrestrial or aquatic vegetation on state trust land.

---

**8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:**

*Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify direct, indirect, and cumulative effects to fish and wildlife.*

**No Action:** No changes to existing habitats would be anticipated.

**Proposed Action:** DNRC jurisdiction in the project area is limited to below the low water mark. No appreciable changes to existing habitats on DNRC-managed lands would be anticipated.

**Fisheries**

**No Action:** The existing sewer force main line is currently damaged. A temporary repair took place, but if the existing structure were to remain, a more robust repair would need to occur. Further damage could impact fisheries downstream if raw sewage were to leak into the Clark Fork River.

**Action Alternative:** This would be an underground main sewer line. No in stream activities would occur. No impacts to fisheries would be expected.

---

**9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:**

*Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify direct, indirect, and cumulative effects to these species and their habitat.*

**No-Action:** No disturbance to terrestrial wildlife would occur. No changes to existing habitats would be anticipated. Collectively, no effects to terrestrial wildlife would be anticipated.

**Action Alternative:** DNRC jurisdiction in the project area is limited to below the low water mark. No appreciable changes to existing habitats on DNRC-managed lands would be anticipated.

**Bull Trout:** Bull trout is a federally threatened species and occurs in the Clark Fork River that is over the crossing. No changes to existing fisheries would be expected to occur, as this is an underground main sewer line, and the utility line would be below the creek.

---

**10. HISTORICAL AND ARCHAEOLOGICAL SITES:**

*Identify and determine direct, indirect, and cumulative effects to historical, archaeological or paleontological resources.*

**No Action:** No effects

**Proposed Action:** Because only the bed of the Clark Fork River is state-owned land in the project's area of potential effect, there are no cultural resource concerns. Issuance of an easement will have No Effect to state owned heritage properties as defined in the State Antiquities Act.

---

**11. AESTHETICS:**

*Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify direct, indirect, and cumulative effects to aesthetics.*

**No Action:** The condition of these resources would remain unchanged.

**Proposed Action:** The proposal to drill/bore under the river (out of sight) would not cause additional impacts to the aesthetics of the river corridor.

---

**12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:**

*Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify direct, indirect, and cumulative effects to environmental resources.*

None

---

**13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:**

*List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.*

WGM prepared a professional cultural survey for this project. It can be made available upon request.

---

IV. IMPACTS ON THE HUMAN POPULATION
<ul style="list-style-type: none"><li>• RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.</li><li>• Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.</li><li>• Enter "NONE" if no impacts are identified or the resource is not present.</li></ul>

---



**14. HUMAN HEALTH AND SAFETY:**

*Identify any health and safety risks posed by the project.*

**No Action:** The existing sewer force main line is currently damaged. A temporary repair took place, but if the existing structure were to remain, a more robust repair would need to occur to prevent raw sewage from leaking into the Clark Fork River.

**Proposed Action:** The proposal would eliminate the potential for raw sewage to leak from the main force sewer line directly into the Clark Fork River if a leak were to develop. This would have a positive impact on human health and safety.

---

**15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:**

*Identify how the project would add to or alter these activities.*

The proposed project would service the town of Saint Regis.

---

**16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:**

*Estimate the number of jobs the project would create, move or eliminate. Identify direct, indirect, and cumulative effects to the employment market.*

The proposed project would be anticipated to provide a short-term employment opportunity for a small crew of people while construction activities occur.

---

**17. LOCAL AND STATE TAX BASE AND TAX REVENUES:**

*Estimate tax revenue the project would create or eliminate. Identify direct, indirect, and cumulative effects to taxes and revenue.*

None. Minor, if any, change in tax base and tax revenues would be anticipated.

---

**18. DEMAND FOR GOVERNMENT SERVICES:**

*Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify direct, indirect, and cumulative effects of this and other projects on government services*

None

---

**19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:**

*List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.*

None

---

**20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:**

*Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify direct, indirect, and cumulative effects to recreational and wilderness activities.*

The proposed project would be underground beneath the channel and would not pose an impediment to navigability or create a safety hazard to boating or floating on the river.

---

**21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:**

*Estimate population changes and additional housing the project would require. Identify direct, indirect, and cumulative effects to population and housing.*

Direct effects on population and housing would be estimated to be minimal.

---

**22. SOCIAL STRUCTURES AND MORES:**

*Identify potential disruption of native or traditional lifestyles or communities.*

None

---

**23. CULTURAL UNIQUENESS AND DIVERSITY:**

*How would the action affect any unique quality of the area?*

None

---

**24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:**

*Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify direct, indirect, and cumulative economic and social effects likely to occur as a result of the proposed action.*

**No Action:** The existing sewer force main line is currently damaged. A temporary repair took place, but if the existing structure were to remain, a more robust repair would need to occur.

**Proposed Action:** Granting of the proposed easement would return approximately \$9,232 to the Public Land-Navigable Rivers trust.

<b>EA Checklist Prepared By:</b>	<b>Name:</b> Amy Helena	<b>Date:</b> May 23, 2023
	<b>Title:</b> Missoula Unit Manager	

## V. FINDING

### 25. ALTERNATIVE SELECTED:

I select the action alternative; granting an easement involving .27 acres of State-owned property below the low water mark of the Clark Fork River, thereby accommodating the installation of an underground main sewer line as proposed by SRSD.

### 26. SIGNIFICANCE OF POTENTIAL IMPACTS:

The action alternative will not result in significant environmental impacts.

### 27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

☐


EIS

☐

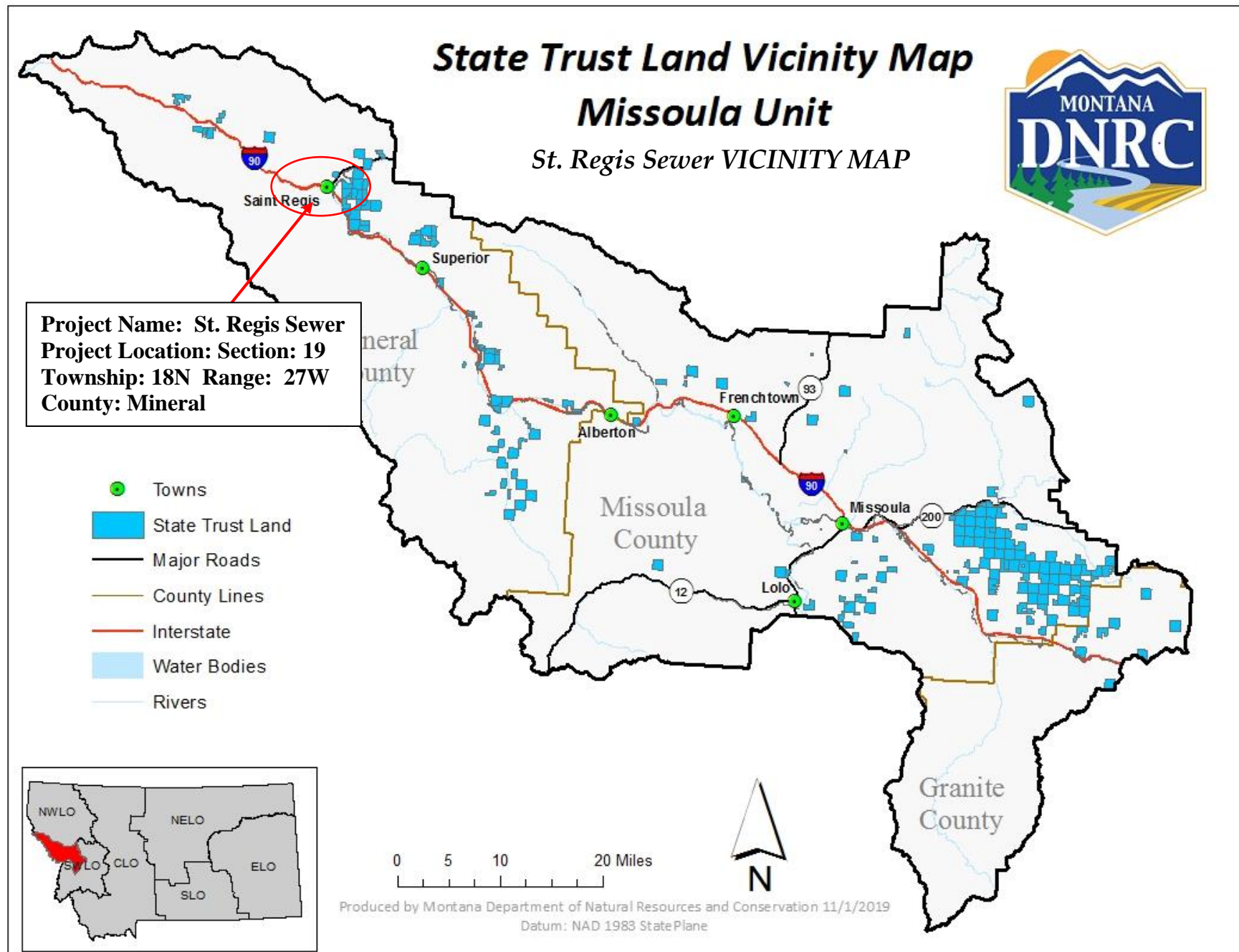
More Detailed EA

☒

No Further Analysis

<b>EA Checklist Approved By:</b>	<b>Name:</b> Sierra Farmer
	<b>Title:</b> Trustlands Program Manager
<b>Signature:</b> 	<b>Date:</b> 5/26/2023

A-1: Vicinity Map



## A-2 SRSD proposal diagram

